

## NOTICE OF AIR POLLUTION PERMIT

May 14, 2014

CERTIFIED MAIL: 7000 0600 0025 3505 6470  
RETURN RECEIPT REQUESTED

### ISSUED TO:

Mr. Robert G. Diard  
South Florida Operations Manager – Concrete Pipe Division  
Hydro Conduit Corporation  
13100 NW 118 Avenue  
Miami, Florida 33178

Permit Number: 0251313-002-AO  
Issue Date: May 14, 2014  
Expiration Date: May 13, 2019

**Project:** Hydro Conduit Corporation State Air Operation Permit Renewal

**Facility Description:** Concrete pipe and culvert manufacturer (Major SIC Code 3271 Concrete Block and Brick; NAICS 327331 Concrete Block and Brick Manufacturing)

**Location:** 13100 NW 118 Avenue, Miami, Miami-Dade County, Florida, 33178

**Lat./Long:** 25° 54' 00" N / 80° 26' 00" W

This is Permit Number 0251313-002-AO to operate an air pollution source issued by the **Miami-Dade County Department of Regulatory and Economic Resources (RER), Division of Environmental Resources Management pursuant to Chapter 24, Code of Miami-Dade County and Chapter 403.087, Florida Statutes (F.S.)**. This is a State Air Operating Permit authorizing the operation of the emissions units described in this permit.

*The Florida Department of Environmental Protection (FDEP) has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). However, in accordance with Section 403.182, F.S., the FDEP recognizes the RER as the approved local air pollution control program of Miami-Dade County. Through a Specific Operating Agreement, the FDEP delegated to the RER the authority to issue or deny permits for this type of air pollution source located in Miami-Dade County.*

### STATEMENT OF BASIS:

This permit is issued under the provisions of **Chapter 24, Code of Miami-Dade County, Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F. A. C.) Rules 62-4, and 62-204 through 62-297**, and in conformance with all existing regulations of the FDEP and the RER rules. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the RER and made a part hereof and specifically described in this permit.

**PERMIT CONTENTS:**

- Part I -- Summary Information
- Part II -- Facility-Wide Specific Conditions
- Part III -- Emissions Unit Specific Conditions
- Appendix A – General Conditions

**PART I -- SUMMARY INFORMATION**

This permit addresses the following air pollution emissions unit(s):

Emissions Unit Number	Emissions Unit Description
	<p><b>Concrete pipe and culvert Manufacturing Operations.</b></p>
001	Concrete Pipe Curing Facility One (1) Buderus Manufactured, Model No. G5 direct-fired Steam Generator
002	Concrete batch plant with baghouse #1
003	Concrete batch plant with baghouse #2

**SIGNIFICANT DATES:**

03-17-2014: received Application for State Air Operation Permit Renewal

**FACILITY REGULATORY CLASSIFICATION:**

This facility is a natural minor, Non-Title V source of air pollution.

**PERMIT HISTORY:**

<u>Permit</u>	<u>Description</u>	<u>Issue Date</u>	<u>Exp. Date</u>
Permit No. 0250659-004-AC	Construction Permit	October 21, 1997	October 20, 1998
Permit No. 0250659-005-AO	Revised Operating Permit	July 30, 1999	July 29, 2004
Permit No. 0250659-008-AO	Operating Permit Renewal	June 23, 2004	June 22, 2009
Permit No. 0250659-011-AC	Construction Permit	October 14, 2008	April 13, 2009
Permit No. 0251313-001-AO	Operating Permit	May 22, 2009	May 21, 2014

0251313-002-AO Current Project for Operating Permit Renewal

## PART II - FACILITY-WIDE SPECIFIC CONDITIONS

### 1.0 Administrative Requirements

- 1.1 Regulating Agencies: All applications, tests, reports, notifications, or other submittals required by this permit shall be submitted to the Miami-Dade County Regulatory and Economic Resources (RER), Division of Environmental Resources Management, Air Quality Management located at 701 NW 1 Court, Suite 400, Miami, Florida 33136.
- 1.2 Citation Format: In this permit, references to F. A. C. Rule 62-xxx refer to rules promulgated under Title 62 of the Florida Administrative Code; references (if any) to 40 CFR 60.xx (or 61.xx or 63.xx) refer to regulations codified under Part 60 (or 61 or 63) of Title 40 of the Code of Federal Regulations.
- 1.3 Specific and General Conditions: The owner or operator shall be subject to the specific conditions of this permit and the owner or operator shall be aware of, and operate under, the attached General Conditions, attached as Appendix A of this permit. General Conditions are binding and enforceable pursuant to Chapter 403, F.S. [Rule 62-4.160 F. A. C.]
- 1.4 Applicable Regulations: This facility is subject to regulation of Florida Administrative Code (F. A. C.) Rules 62-4 and 62-204 through 62-297. Issuance of this permit does not relieve the facility owner or operator from compliance with any other applicable federal, state, or local permitting requirements or other regulations.
- 1.5 Waste Disposal: The owner or operator shall treat, store, and dispose of all liquid, solid and hazardous wastes in accordance with all applicable Federal, State and Local regulations.
- 1.6 Other Permits: This air pollution permit does not preclude the owner or operator from obtaining any other types of required permits, licenses or certifications from the RER or other departments or agencies.
- 1.7 Renewal of This State Permit Required: An application for renewal of this air operating permit must be submitted to the RER, Air Quality Management **at least 60 days prior** to the expiration date of this permit. To apply for renewal of an operating permit, the applicant shall submit the appropriate application form in triplicate, the appropriate application fee, all required compliance test results, and such additional information as the RER may require by law.  
[Rule 62-4.030, 62-4.050, and 62-4.220 F. A. C.]

Note that public notice may be required again at the time of renewal or revision of this permit if the facility or permit is materially changed from that described by this permit.

[Rule 62-210.350(4)(a) F. A. C.]

- 1.8 County Permit Renewal: A request for renewal of the Miami-Dade County annual air operating permit must be submitted annually to the RER Air Quality Management on the appropriate form, **by May 31<sup>st</sup> of each calendar year**, along with the appropriate Miami-Dade County permit fee.  
[Chapter 24-18, Code of Miami-Dade County]

## **2.0 General Pollutant Emission Limiting Standards**

- 2.1 Objectionable Odor Prohibited: No person shall cause, suffer, allow, or permit the discharge of air pollutants, which cause or contribute to an objectionable odor.  
[Rule 62-296.320(2) F. A. C.]
- 2.2 General Visible Emissions Standard: Unless otherwise specified by permit or rule, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than 20 percent opacity at any time.  
[Rule 62-296.320(4)(b) F. A. C.]
- 2.3 Volatile Organic Compounds/Organic Solvents Emissions:  
No person shall store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the RER.  
Such controls include the following:
- Tightly cover or close all VOC containers when they are not in use.
  - Tightly cover all open tanks, which contain VOC when they are not in use.
  - Maintain all pipes, valves, fittings, etc., which handle VOC in good operating condition.
  - Confine rags used with VOC to tightly closed, fireproof containers when not in use.
  - Immediately confine and clean up VOC spills and make sure wastes are placed in closed containers for reuse, recycling or proper disposal.
- [Rule 62-296.320(1) F. A. C.]
- 2.4 Unconfined Emissions of Particulate Matter:  
No person shall cause, let, permit, suffer or allow the emissions of unconfined particulate matter from any activity, including vehicular movement; transportation of materials; construction, alteration, demolition or wrecking; or industrially related activities such as loading, unloading, storing or handling; without taking reasonable precautions to prevent such emissions.  
Reasonable precautions include the following:
- Paving and maintenance of roads, parking areas and yards.
  - Application of water or chemicals to control emissions from such activities as demolition of buildings, grading roads, construction, and land clearing.
  - Application of asphalt, water, chemicals, or other dust suppressants to unpaved roads, yards, open stock piles, and similar activities.
  - Removal of particulate matter from roads and other paved areas under the control of the owner or operator of the facility to prevent re-entrainment and from buildings or work areas to prevent particulate from becoming airborne.
  - Landscaping or planting of vegetation.
  - Use of hoods, fans, filters, and similar equipment to contain, capture, and/or vent particulate matter.
  - Confining abrasive blasting where possible.
  - Enclosure or covering of conveyor systems.
  - Substitution of powdery materials with granular or pelletized materials, where possible.
- [Rule 62-296.320(4)(c) F. A. C.]

### **3.0 Operation Requirements**

- 3.1 Circumvention: No person shall circumvent any air pollution control device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.  
[Rule 62-210.650 F. A. C.]
- 3.2 Excess Emissions: Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted providing best operational practices to minimize emissions are adhered to, and the duration of excess emissions shall be minimized but in no case exceeds two hours in any 24 hour period unless specifically authorized by the RER for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited.  
[Rule 62-210.700 F. A. C.]

### **4.0 Compliance Testing Requirements**

- 4.1 Test Notification: Unless otherwise specified in this permit, the RER, Air Quality Management shall be notified in writing of expected compliance test dates (when required) at least fifteen (15) days prior to compliance testing. The notification shall include the following information: the date, time, and location of each test, and the test contact person who will be responsible for coordinating and having such test conducted for the owner.  
[Rule 62-297.310(7) (a) 9 F. A. C.]
- 4.2 Testing at Capacity: Compliance testing (when required) shall be conducted with the emission units operating at the permitted capacity (90 to 100% of the maximum permitted operation rate of the emission units). If an emission unit is not tested at permitted capacity, the emission unit shall not be operated above 110% of the test load until a new test showing compliance is conducted. Operation of the emissions unit above 110% of the test load is allowed for no more than 15 days for the purpose of conducting additional compliance testing to regain the authority to operate at the permitted capacity.  
[Rule 62-297.310(2) F. A. C.]
- 4.3 Special Compliance Tests: When the RER, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard in Rules 62-204 through 62-297 or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the RER.  
[Rule 62-297.310(7) (b) F. A. C.]

### **5.0 Reporting and Record Keeping Requirements**

- 5.1 Report Excess Emissions: In case of excess emissions resulting from malfunctions, each owner or operator shall notify the RER in accordance with Rule 62-4.130, F. A. C. (condition 5.2 below). A full written report on the malfunctions shall be submitted in a quarterly report, if requested by the RER.  
[Rule 62-210.700(6) F. A. C.]

5.2 Report Plant Operation Problems: If the owner or operator is temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by hazard of fire, wind or by other cause, the owner or operator shall immediately notify the RER. Notification shall include pertinent information as to the cause of the problem, and what steps are being taken to correct the problem and to prevent its recurrence, and where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the owner or operator from any liability for failure to comply with the FDEP and the RER rules.

[Rule 62-4.130 F. A. C.]

5.3 Retain Records: All records required by this permit shall be kept by the owner or operator and made available for the RER inspection for a minimum of three (3) years from the date of such records.

[Rule 62-4.160 (14) (b) F. A. C.]

5.4 Compliance Test Reports: Compliance test reports (when required) shall be submitted to the RER Air Quality Management, as soon as practical, but no later than 45 days after the last sampling run of each test is completed.

Test reports shall provide sufficient detail on the emissions unit tested and the test procedures used to allow the RER to determine if the test was properly conducted and the test results properly computed. Test reports, other than for an EPA Method 9 test, shall include the following information and other information as necessary to make a complete report required pursuant to F. A. C. Rule 297.310(8)(c):

- The normal type and amount of fuels used and materials processed, and the types and amounts of fuels used and material processed during each test run.
- The means, raw data and computations used to determine the amount of fuels used and materials processed, if necessary to determine compliance with an applicable emission limiting standard.
- The type of air pollution control devices installed on the emissions unit, their general condition, their normal operating parameters (pressure drops, total operating current and GPM scrubber water), and their operating parameters during each test run.
- All measured and calculated data required to be determined by each applicable test procedure for each run.
- The detailed calculations for one run that relate the collected data to the calculated emission rate.
- The applicable emission standard, and the resulting maximum allowable emission rate for the emissions unit, plus the test result in the same form and unit of measure.

[Rule 62-297.310(8)(a) &(b) F. A. C.]

5.5 Report Required: The Annual Operating Report (DEP Form 62-210.900(5)) shall be completed each year and submitted to the Miami-Dade County, RER, Air Quality Management Division office or submitted electronically to the Florida Department of Environmental Protection by April 1 of the following year.

[Rule 62-210.370(3) F. A. C.]

**PART III -- EMISSIONS UNIT SPECIFIC CONDITIONS**

This part of this permit addresses the following emissions units:

Emissions Unit Number	Emissions Unit Description
001	<p><b>Concrete pipe and culvert Manufacturing Operations.</b></p> <p>Concrete Pipe Curing Facility            One (1) Buderus Manufactured, Model No. G5 direct-fired Steam Generator            A curing facility for concrete pipe            Unit capable of firing propane and natural gas            Maximum heat input rate: 3 mmBtu/hr</p>
002	<p>Concrete Batch Plant with Baghouse #1: Maximum process rate is 70 yds per hour            Emissions are controlled by a single compartment bag type dust collector            Manufacturer: Shako            Bag Diameter: 200 mm            Bag Length: 11.5 m – 13.0 m            No. of Bags: 14            Air to Cloth Ratio: 3:1            Filtering Material: Polyester            Bag Cleaning Method: Automatic cleaning            Bag Surface Area: 22.5 square meters            Flow Rate: 9056 ACFM            Filtering Velocity: 6.2 ft/min            Filterint efficiency: 99.9% (minimum)</p>
003	<p>Concrete Batch Plant with Baghouse #2: Maximum process rate is 70 yds per hour            Emissions are controlled by single compartment bag type dust collector            Manufacturer: Shako            Bag Diameter: 200 mm            Bag Length: 11.5 m – 13.0 m            No. of Bags: 14            Air to Cloth Ratio: 3:1            Filtering Material: Polyester            Bag Cleaning Method: Automatic cleaning            Bag Surface Area: 22.5 square meters            Flow Rate: 9056 ACFM            Filtering Velocity: 6.2 ft/min            Filtering efficiency: 99.9% (minimum)</p>

## **1.0 Emissions Limiting Standards and Operation Restrictions**

- 1.1 Weigh Batcher: The weigh batcher used in the concrete facility shall be fully enclosed  
[Rule 62.4.070(3) F.A.C.; Air Construction Permit No 0250659-011-AC]
- 1.2 Visible Emissions: Visible emissions from silos, weight hoppers, and other enclosed storage and conveying equipment shall be controlled to the extent necessary to limit visible emissions to 5% opacity.  
[Rule 62-296.414(1) F. A. C.; Air Construction Permit No. 0250659-011-AC]
- 1.3 Allowable Fuels: Fuels burned shall be limited to propane and natural gas.  
[Rule 62-4.070(3) F. A. C.; Air Construction Permit No 0250659-011-AC]
- 1.4 Unconfined Emissions: The owner or operator shall take reasonable precautions to control unconfined emissions from hoppers, storage and conveying equipment, conveyour drop points, truck loading and unloading, roads, parking areas, stock piles, and yards. In addition to those required by Rule 62-296.320(4)(c) F.A.C., the following shall constitute reasonable precautions for concrete batching plants:
- Reduction of stockpile height or installation of wind breaks to mitigate wind entrainment of particulate matter from stockpiles
  - Use of spray bar, chute, or partial enclosure to mitigate emissions at the drop point to the truck.
- [Rule 62-296.414(2) F. A. C.; Air Construction Permit No 0250659-011-AC]
- 1.5 Hours of Operation: The referenced emission unit(s) may operate continuously, i.e. 8,760 hours per year.  
[Rules 62-4.070(3) F.A.C; Air Construction Permit No 0250659-011-AC]

## **2.0 Compliance Monitoring and Recordkeeping Requirements**

- 2.1 Visible Emissions Test Required: The permittee shall have a formal compliance test conducted annually (EU 002 & 003) for visible emissions by EPA Method 9 as described at 40 CFR, part 60 Appendix A, adopted and incorporated by reference at Rule 62-204,800, F.A.C. Visible emissions tests shall meet all applicable requirements of Chapter 62-297.310 F.A.C.  
Visible emissions tests of silo dust collector exhaust points shall be conducted while loading the silo at a rate that is representative of the normal silo loading rate. The minimum loading rate shall be 25 tons per hour unless such rate is unachievable in practice. If emissions from the weight hopper (batcher) operation are also controlled by the silo dust collector, the batching operation shall be in operation during the visible emissions test. The batching rate during the emissions test shall be representative of the normal batching rate and duration. Each test report shall state the actual silo loading rate during emissions testing and, if applicable whether or not batching occurred during emissions testing. If emissions from the weight hopper (batcher) operation are controlled by a dust collector which is separate from the silo dust collector, visible emissions tests of the weight hopper (batcher) dust collector exhaust point shall be conducted while batching at a rate that is representative of the normal batching rate and duration.  
Each test report shall state the actual batching rate during emissions testing.  
[Rule 62-296.414(3) & (4); Rule 62-297.401(9) F. A. C., Air Construction Permit No 0250659-011-AC].
- 2.2 Control Equipment: The permittee shall visually inspect each emissions unit and associated baghouse daily to ensure that each baghouse is operating properly, and shall record the condition of each baghouse and pressure drop when inspected. The permittee shall perform a detailed inspection of each associated baghouse monthly and record the inspection results. Such inspection shall include general condition of the emission control equipment and ductwork, condition of the bags and appurtenances, and verification of proper operation of the bag cleaning cycle.  
[Rule 62-4 070(3) F.A.C.; Air Construction Permit No 0250659-011-AC]

**3.0 Reporting and Record Keeping Requirements**

- 3.1 Control Equipment: The permittee shall maintain record of the daily and monthly control equipment inspection results.  
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No 0250659-011-AC]
- 3.2 Recordkeeping Requirements: The permittee shall keep a log to document the monthly and rolling consecutive 12-month usage of propane and natural gal.  
[Rule 62-4.070(3) F.A.C.; Air Construction Permit No 0250659-011-AC]

Executed in Miami-Dade County, Florida.

REGULATORY AND ECONOMIC RESOURCES

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H. Patrick Wong, Chief  
Air Quality Management

Date

HPW/hs

Copy: Patricia Tampas, Florida Department of Environmental Protection, Southeast District Office.

[\(Patricia.Tampas@dep.state.fl.us\)](mailto:Patricia.Tampas@dep.state.fl.us)

Veronica N. Sgro, P.E., Koogler & Associates, Inc. 4014 NW 13<sup>th</sup> Street, Gainesville, FL 32609-5822.  
[vsgro@kooglerassociates.com](mailto:vsgro@kooglerassociates.com).

**FILING AND ACKNOWLEDGMENT**: FILED, on this date, pursuant to § 120.52(7), F.S., with the designated RER Clerk, receipt of which is hereby acknowledged.

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Clerk

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Date